



151 Southhall Lane, Ste 450  
Maitland, FL 32751  
P.O. Drawer 200  
Winter Park, FL 32790-0200  
[www.inteserra.com](http://www.inteserra.com)

March 1, 2018  
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary  
Federal Communications Commission  
9050 Junction Drive  
Annapolis Junction, MD 20701

<b>RE: Atlantic Broadband (CT), LLC</b>	<b>Filer ID: 831128</b>
<b>Atlantic Broadband (Delmar), LLC</b>	<b>Filer ID: 831131</b>
<b>Atlantic Broadband (Miami), LLC</b>	<b>Filer ID: 831132</b>
<b>Atlantic Broadband Enterprise, LLC</b>	<b>Filer ID: 830062</b>
<b>Atlantic Broadband (Penn), LLC</b>	<b>Filer ID: 831130</b>
<b>Atlantic Broadband (SC), LLC</b>	<b>Filer ID: 831129</b>
<b>Atlantic Broadband Finance, LLC</b>	<b>Filer ID: 826014</b>

**CPNI Certification - EB Docket No. 06-36; CY2017**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2017 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Atlantic Broadband Enterprise LLC and its affiliates – Atlantic Broadband (CT), LLC, Atlantic Broadband (Delmar), LLC, Atlantic Broadband (Miami), LLC, Atlantic Broadband (Penn), LLC, Atlantic Broadband (SC), LLC and Atlantic Broadband Finance, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [Sthomas@inteserra.com](mailto:Sthomas@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas  
Consultant

Enclosures  
ST/im

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB DOCKET 06-36**

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Annual 64.2009(e) CPNI Certification for:

Calendar Year 2017

**Name of Companies covered by this certification:**

**Atlantic Broadband (CT), LLC**

**Form 499 Filer ID: 831128**

**Atlantic Broadband (Delmar), LLC**

**Form 499 Filer ID: 831131**

**Atlantic Broadband (Miami), LLC**

**Form 499 Filer ID: 831132**

**Atlantic Broadband Enterprise, LLC**

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**Atlantic Broadband (Penn), LLC**

**Form 499 Filer ID: 831130**

**Atlantic Broadband (SC), LLC**

**Form 499 Filer ID: 831129**

**Atlantic Broadband Finance, LLC**

**Form 499 Filer ID: 826014**

Name of Signatory:

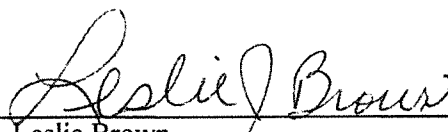
Leslie Brown

Title of Signatory:

Senior Vice President / General Counsel / Secretary

I, Leslie Brown, as an officer of the above stated companies, certify and state that:

1. I am the Senior Vice President / General Counsel / Secretary of Atlantic Broadband (CT), LLC, Atlantic Broadband (Delmar), LLC, Atlantic Broadband (Miami), LLC, Atlantic Broadband Enterprise, LLC, Atlantic Broadband (Penn), LLC, Atlantic Broadband (SC), LLC, and Atlantic Broadband Finance, LLC (collectively known as the "Atlantic Broadband Companies") and, acting as an officer and agent of the Atlantic Broadband Companies, I have personal knowledge that the Atlantic Broadband Companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification, as Exhibit A, is an accompanying statement explaining how the Atlantic Broadband Companies' procedures ensure that the Atlantic Broadband Companies are in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The Atlantic Broadband Companies have not taken any actions (i.e., proceedings instituted or petitions filed by the Atlantic Broadband Companies at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The Atlantic Broadband Companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The Atlantic Broadband Companies represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Atlantic Broadband Companies also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Leslie Brown

Senior Vice President / General Counsel / Secretary

2-28-18

Date

**Atlantic Broadband (CT), LLC**  
**Atlantic Broadband (Delmar), LLC**  
**Atlantic Broadband (Miami), LLC**  
**Atlantic Broadband Enterprise, LLC**  
**Atlantic Broadband (Penn), LLC**  
**Atlantic Broadband (SC), LLC**  
**Atlantic Broadband Finance, LLC**  
**Calendar Year 2017**

Attachments: Accompanying Statement

ACCOMPANYING STATEMENT  
ANNUAL 47C.F.R § 64.2009(e) CPNI CERTIFICATION

The policy of Atlantic Broadband Finance, LLC and its subsidiaries (collectively, “ABB”) is to comply with the letter and spirit of all laws of the United States, including those pertaining to CPNI contained in § 222 of the Telecommunications Act of 1996, as amended, 47 USC § 222 and the FCC’s regulations, 47 CFR § 64.2001- .2011. ABB will revise its procedures as needed to reflect any subsequent revisions to the applicable law and regulations addressing CPNI.

1. **Use of CPNI**

The Company has adopted specific CPNI policies to ensure that, in the absence of customer approval, it may only use, disclose, or permit access to individually identifiable CPNI in its provision of: (1) the telecommunications service from which the information is derived; (2) services necessary to, or used in, the provision of the telecommunications service, including the publishing of directories; or (3) as otherwise permitted by law and regulation.

ABB does not use, disclose, or permit access to CPNI to market service offerings to a customer that are not within a category of service to which the customer already subscribes, unless ABB has customer approval to do so.

ABB does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.

2. **Obtaining Customer Approval for Use of CPNI**

ABB has established methods to obtain customer approval for use of CPNI through written or electronic methods, including:

ABB establishes methods to allow a customer to limit or revoke their approval or disapproval.

**Opt- Out Approval Processes**

- a. ABB may utilize the opt-out method to obtain approval to use CPNI for the purpose of marketing communications-related services to that customer.
- b. ABB may utilize the opt-out method to obtain approval to disclose CPNI, for the purpose of marketing ABB communications-related services to that customer, to its agents or to its affiliates that provide communications-related services.

**Opt-In Requirements**

ABB shall prohibit use of CPNI for any purpose that requires opt-in approval.

### 3. **Notice Required for Use of CPNI**

Prior to soliciting any customer approval to use, disclose, or permit access to customers' CPNI, ABB notifies the customer of the customer's right to restrict use of, disclosure of, and access to, the customer's CPNI. ABB provides such notice to new customers at the time of subscription, and ABB's CPNI policy is posted on the company's website. The content of customer notification meets the requirements of Section 64.2008 (c) and (d) of the Commission's CPNI Rules. ABB provides notification to obtain opt-out approval through written methods and waits at least a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. The notice discloses the applicable waiting period for a response before approval is assumed. The Opt-Out method is available to every customer at no additional cost to the customer and available 24 hours a day, seven days a week.

ABB does not use methods that require opt-in approval; therefore has not established procedures for opt-in notice and approval.

In instances where the Company seeks one-time customer approval for the use or disclosure of CPNI, the Company obtains such approval in accordance with the disclosures, methods and requirements under the Commission's rules.

### 4. **Company Safeguards for Use of CPNI**

ABB has established a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

ABB has trained all its personnel as to when they are and are not authorized to use CPNI, and has adopted and communicated an express disciplinary process. Any improper use shall be treated as a serious offense, and may result in suspension or termination of employment in appropriate cases. Any company personnel making improper use of CPNI will undergo additional training to ensure future compliance. ABB will provide additional training on an as-needed basis.

ABB has established a supervisory review process regarding compliance with the Commission's rules for outbound marketing situations using CPNI and maintains records of ABB compliance for a minimum period of one year. Sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

An ABB officer, as an agent of the carrier, signs and files with the FCC a compliance certificate on or before March 1 of each year.

ABB shall provide written notice to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

5. **Safeguards On The Disclosure of CPNI**

Atlantic Broadband and its employees will take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. ABB has established procedures and trains personnel so customers are properly authenticated before accessing CPNI based on customer-initiated telephone contact, online account access or an in-store visit, in accordance with Section 64.2010 (b)-(d) of the Commission's rules.

ABB will authenticate a customer without the use of readily available biographical information or account information prior to the customer establishing a password or in the case of a lost or forgotten password. Authentication is accomplished through the use of a Personal Identification Number ("PIN"). The PIN is randomly generated and supplied to new customers at service initiation. For existing customers, PINs were mailed to the address of record. At the time of password creation, customers will establish a back up authentication method that does not prompt the customer for readily available biographical information or account information. Customers that cannot provide the correct password or the correct response to their back-up authentication method must establish a new password as described in this paragraph.

ABB will notify the customer when there are account changes, such as change of password, response to secret questions, address of record. ABB may notify customer by voicemail to the telephone number of record, or by mail (postal or electronic) to the address of record.

**Business customer exemption.**

ABB may use different authentication methods for a business customer if such methods are contractually binding, the negotiated service contract specifically discloses ABB's policy to protect CPNI, and the customer has a dedicated ABB account representative.

**Additional Protection Measures**

ABB will take additional steps to protect the privacy of its customers' CPNI and to discover and protect against activity that is indicative of pretexting.

6. **Notification Of CPNI Security Breach**

**Notification of law enforcement and customers.**

The Company has established policies and procedures to comply with the requirements of Section 64.2011 of the Commission's rules. ABB will notify law enforcement and customers within the required timeframes. A record of any breaches and required

notifications will be kept for a minimum of two years and will include all information required by Rule 64.2011.

7. **Recordkeeping**

ABB's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. ABB maintains records of customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.

ABB will maintain separate files in which it will retain any court orders respecting CPNI.